



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO ATTENTION OF
ECW-15J

VIA ELECTRONIC MAIL

Mayor Curtis McCall Sr.
City of Cahokia Heights
103 Main Street
Cahokia, Illinois 62206
rwilliams@centownil.com

Subject: August 16, 2021, Administrative Order on Consent ("Order") –Approval of Targeted Dry-Weather SSO Investigation Plan (paragraph 48.B.a)

Dear Mayor McCall:

Thank you for submitting the November 18, 2021, Revised Targeted Dry-Weather SSO Investigation Plan ("plan"), pursuant to paragraph 48.B.a of the above-referenced Order. The U.S. Environmental Protection Agency reviewed the plan and after consulting with the Illinois EPA, determined that it meets the Order's requirements outlined in paragraph 48.B.a.i-vi. Based on this review, EPA hereby approves the November 18, 2021 Targeted Dry-Weather SSO Investigation Plan with comments, provided below.

EPA Comments on the Revised Targeted Dry-Weather SSO Investigation Plan

1. **Project Maps**: Please provide or update project maps for N.82nd street and LS 22 project areas to highlight specific areas where work will be done under the plan. Maps should highlight segments of sewers and lift stations where televising, smoke testing, flow monitoring, and visual inspections will take place under the plan. In cases where work (e.g., televising, smoke testing, flow monitoring, etc.) will be determined based on results of initial investigations, highlight potential investigation areas.
2. **Flow monitoring**: Please provide additional detail regarding flow monitoring. Will flow monitoring include installation/deployment of flow monitoring devices that will allow for monitoring during wet-weather conditions?
3. **Plan schedule spreadsheet**: Please revise the project plan schedule worksheet to clarify that periods indicate "weeks".

Since the above comments do not involve changes in work activities or schedules, please proceed with all actions identified in the plan, pursuant to paragraph 59 of the Order. Pursuant to paragraph 48.B.b of the Order, please submit the revised plan addressing the above-comments within 30 days after your receipt of this letter. Also, the November 18, 2021, Targeted Dry-Weather SSO Investigation Plan did not include the certification statement required pursuant to paragraph 54 of the Order, and was not distributed to all the recipients required under paragraph 50 of the Order. Please submit all future deliverables pursuant to paragraph 50 of the Order, including the paragraph 54 certification.

Thank you for your efforts to bring the City into compliance with the Clean Water Act. If you have any questions or concerns regarding this approval, please contact Dean Maraldo of my staff at (312) 353-2098 or maraldo.dean@epa.gov, or your legal counsel may contact Lauren Grady at (202) 598-1866 or lauren.grady@usdoj.gov.

We look forward to receiving your response.

Sincerely,

Nefertiti DiCosmo, Chief
Water Enforcement and Compliance Assurance Branch

cc: Lynn Branson Matchingtouch, City of Cahokia Heights [lbranson@cahokiaillinois.org]
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